

[Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**JOINT STATUS REPORT REGARDING
CUSTODIAN DISPUTE**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

JOINT STATUS REPORT

Pursuant to the Court's October 9, 2024 Discovery Management Order (ECF 1732) the parties respectfully submit the following report regarding the selection of custodians.

The parties have reached final agreement as to the remaining custodians to complete the set of 55 custodians for both the JCCP and the MDL, per the parties July 8, 2024 agreement. As part of this agreement, the parties mutually agree to withdraw their competing motions for custodian candidates.¹ The 55 agreed custodians are listed below. Plaintiffs agree to accept Uber's proposed custodians regarding issues related to the ISSP and intend to pursue their subpoena served on Lyft.

1	Anderson, Brooke	29	Kaiser, Roger
2	Akamine, Mike	30	Kalanick, Travis
3	Baker, Ed	31	Kansal, Sachin
4	Baker, Matt	32	Kawada Page, Jodi
5	Barnes, William	33	Khosrowshahi, Dara
6	Breeden, Tracey	34	Lake, Carley
7	Brown, Greg	35	Lewis, Jenny
8	Burke, Jordan	36	Luu, Jenny
9	Bushra, Faiz	37	Maredia, Sarfraz
10	Cardenas Phil	38	Marshall, Jeff
11	Chang, Frank	39	McDonald, Katy
12	Cinelli, Dennis	40	Muerhcke, Susan
13	Coker, Lucas	41	Parker, Kate
14	Ding, Abbie	42	Patel, Niraj
15	Fogg, Chad	43	Pimentel, Andi
16	Foran, Tim	44	Poetzcher, Cameron
17	Freivogel, Cory	45	Richter, David
18	Fuldner, Gus	46	Rikhye, Vhaibhav
19	Gibbons, Catherine	47	Sheridan, Danielle
20	Graves, Ryan	48	Shuping, Valarie
21	Hasbun, Andrew	49	Silver, Nick
22	Hawk, Cassie	50	Stevenson, Troy
23	Hazelbaker, Jill	51	Sullivan, Joe
24	Henley, Mat	52	Sullivan, Michael
25	Holt, Rachel	53	Twomey, Pat
26	Hourdajian, Nairi	54	Whaling, Kayla
27	Jones, Mark	55	Whetstone, Rachel
28	Joyce, Meghan		

¹ The parties reserve their respective rights to seek relief, including requesting or limiting additional custodians for good cause if the need arises as discovery progresses.

Respectfully submitted,

By: /s/Roopal Luhana
ROOPAL P. LUHANA (*Pro Hac Vice*)
CHAFFIN LUHANA LLP
600 Third Avenue, Fl. 12
New York, NY 10016
Telephone: (888) 480-1123
Email: luhana@chaffinluhana.com
Co-Lead Counsel for Plaintiffs

SARAH R. LONDON (SBN 267083)
**LIEFF CABRASER HEIMANN &
BERNSTEIN**
275 Battery Street, Fl. 29
San Francisco, CA 94111
Telephone: (415) 956-1000
Email: slondon@lchb.com

RACHEL B. ABRAMS (SBN 209316)
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Email: rabrams@peifferwolf.com

By: /s/ Michael B. Shortnacy
MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
SHOOK, HARDY & BACON, L.L.P.
2049 Century Park East, Suite 3000
Los Angeles, CA 90067
Telephone: (424) 285-8330
Facsimile: (424) 204-9093

PATRICK OOT (*Pro Hac Vice* admitted)
oot@shb.com
SHOOK, HARDY & BACON, L.L.P.
1800 K Street NW, Suite 1000
Washington, DC 20006
Telephone: (202) 783-8400
Facsimile: (202) 783-4211

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice*
admitted)
cgrusauskas@paulweiss.com
ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Roopal P. Luhana